TRI Public Meeting

JUNE 18 - 19, 1998

DR. AUGUSTYNIAK : Yes and I will try to talk at less than 350 words a minutes. Morning, I am Christine Augustyniak, the Associate Director for the Environmental Associates Division. We are the group at the EPA that has responsibility for the Toxic Release Inventory.

Having welcomed you to this public meeting and let me tell you a little about we hope to accomplish here. The purpose of this meeting is to get information from the public on ways to improve Toxic Release Inventory.

Ways to improve the information that we collect and when we present information and ways to streamline the reporting form so that reporting on emissions is less work for some of the people that have to report.

We are holding approximately nine public meetings. This is the sixth. We've been to Washington, New York, Boston, San Francisco, Chicago. We are here today. We have Kansas City next week. In addition to holding public meetings, you have another problem. You have a Federal Advisory Committee that is constituted to give us advise and that Committee is holding meetings in Washington.

To help out this process, we are also taking comments at other kinds. You know, if there is something that you are not ready to say today you can submit written comments to us and our hope is to collect a lot of ideas to improve the Toxic Release Inventory from the point of view of the people who report and from the point of view of the people who use for information.

But because before last year, we announced that we would be undertaken those activities. The public meetings, the advisory committee, and taking comments are all part of our response to this commitment that we want in this issue.

This is Vicki Anderson. Vicki is a Program Analyst in the Toxic Release Inventory program and I have asked Vicki to go through some of the issues as we see them, the impressions that we have before we

get started.

VICKI ANDERSON : Good morning. Most of, all of the issues that you have hear are already in the issue paper. I just want to briefly touch on this so that we are all familiar with it. If you don=t already have a copy of the issue paper, there are copies in the back of the room.

In regards to the first issue, we are going to be talking about the definition of release as it pertains to Class I of the underground injection wells and Subtitle C landfills. This issue has to do with perceptions of the public meaning that there are some who believe that EPA=s interpretation leads to a public misperception when you are talking about injection of chemicals into the underground injection wells.

Some believe that that doesn=t necessarily equal exposure therefore there is no possibility of exposure. We are looking for, that is not necessarily the case, but there are some people that believe that, okay, we need to address this issue. So we are looking for suggestions on ways to improve the way we collect data regarding this as well as the way to disseminate information. Suggestions may include nomenclature, format changes, characterization of data as well as actual changes to the Form R. That is the first issue.

With regard to the second issue, which centers Section 6 of the Form R where we collect information on chemicals transferred to publicly owned treatment works facilities or POTWs. The issue there is that some believe that chemicals that go to POTWs are treated completely and therefore there is no release of these chemicals to the environment.

There are others who believe that POTW facilities should treated chemicals to a minimal degree and therefore there is a release to the environment. What we are looking for here is ways to collect this information with regards to off-site transfers, want to make this information more useful, more understandable to the public, and we want

to make a distinction between off-site treatment versus off-site release so that the public is clear on the differences between the two.

With regard to the third issue, which is Section 8 where we collect information on ways to manage at facility. There are some who are concerned about the perception regarding waste managed at the facility versus waste generated by the facility. They are concerned that the public may think that it is all the same thing and again we need to make a distinction between the two so that it's clear to the public what's what.

So we are looking for information or suggestion on how to change the Form R as well as the ways we disseminate information relating to this information. Those are the three primary issues and we are looking for anything that you have regarding that to help us make life a little easier for those that have to report this information as well as those who are going to be using the information in the public. Any questions? Okay, I am going to turn it back over to Christine.

DR. AUGUSTYNIAK : A couple of housekeeping things probably I think everybody knows. Copies of the vision paper are in the back of the room. The speakers are in the back of the room. We will be going through the speakers in order in which they signed up and it will go on to the bottom of the list. Everybody has signed in. Is that sort of correct? [Unintelligible]

Next is Robert Pregulman from the US PIRG speak first.

MR. PREGULMAN : Would you like to address getting copies of their [unintelligible]

DR. AUGUSTYNIAK : Yes I am sorry, thank you. We appreciate getting the copies with your comments.

MR. PREGULMAN : Can I ask one other quick question? I know that some of the other hearings in other parts of the country, there was opportunity for discussion after the speaker has spoke. Is that going to be the case here or [unintelligible]?

DR. AUGUSTYNIAK : I would be more than happy to hear if people are interested in discussion or people that haven=t signed up would like to speak at the end of the speakers list after [unintelligible]

MR. PREGULMAN : Thanks very much for the opportunity to testify today. My name is Robert Pregulman and I am the Southern Field Organizer for the US Public Interest Research Group. We are the national lobbying office for the state parks and we are a group of non-partisan, non-profit environmental consumer watchdog organizations with a long stand interest in right to now issues.

We have worked with Toxic Release Inventory data extensively over the past several years and have worked to expand and improve the public=s right to know about toxic chemical production, use, and emissions.

I will be speaking from my written comments. I will not go through all of them, but I will try to touch on highlights and afterwards if anybody has any questions I would be happy to try and answer them. I am going to speak primarily to the three different types of issues. But, first it=s source reduction reporting.

In 1990, Congress passed the Pollution Prevention Act and declared it to be the National Policy of the United States stating that pollution should be prevented or reduced at the source whenever feasible.

Prior to 1990, nearly 20 years of environmental laws had sought to control pollution after it had already been created rather than trying to prevent it from being created in the first place. These

technologies include hazardous waste treatment, recycling, incineration, all of which come with risks of environmental contamination, accidents, and human exposure.

Certainly pollution control technology:s are preferable to freely dumping toxics in air, land, and water but often may result in shipping toxic hazards from one environment to the other.

With the passage of Pollution Prevention Act, Congress recognized that steps are needed to address the historical lack of attention to pollution prevention. In 1997, the EPA released the latest data from the 1995 calendar year collected under the Emergency Planning and Community Right to Know Act and Pollution Prevention Act and found out that the manufacturing industries from around the country continuing progress in reducing their toxic releases into air, land, and water. They are failing to prevent toxic pollution at the source.

We ask the EPA to require facilities to report the total production related waste at the facility and that would be adding to Sections 8.1 through 8.7 together. We believe that this reporting is clearly required under Section 66.07 B1 of the Pollution Prevention Act which states that the quality of chemical entering any waste stream or otherwise released into the environment prior to recycling, treatment, or disposal.

The EPA Annual reports on Toxic Release Inventory clearly document that the Pollution Prevention Act has for the most part failed to motivate the industries to reduce the quantities of production related waste that they generate. Furthermore, the data shows that the industries are projecting no improvement in reducing the quantities of waste they manage in the near future.

Much of that waste that is managed at a facility creates a potential toxic hazards that range from accidental spills to leaks to daily worker exposure. There are for example hundreds of superfund sites [phonetic] around the country that resulted from recycling hazardous

waste. By requiring facilities to specify the total quantity of production waste, it will help shift the attention of facility managers, the news media, regulators, and the surrounding public and neighborhoods from reducing releases to reducing waste at the source.

In addition, reporting forms should be modified to enable facilities to distinguish between the waste generated at the reporting facility from those generated elsewhere. This could be simply accomplished by adding a box to Form R to record the amount of total production waste that is not generated at the reporting facility. This will improve data presentation, will help reveal source reduction and address any so called double counting issues.

As far as chemical use reporting is concerned, we urge the EPA to complete the rule making to expand right to know reporting to include toxic use reporting. Specifically, we urged the EPA to require facilities to report simple materials accounting of the chemicals they use including the amount brought on site, used up, and shipped offsite as a waste or product.

This information enables people to measure and thus promote pollution prevention. Specifically chemical use data helps people tell where chemicals go, identify low cost prevention opportunities and understand the life cycle of a chemical, establish baselines for planning, validate emissions data, and improve public understanding.

We have provided more extensive testimonial on this issue in the past so I will not go into it much further, but we do encourage the EPA to require facilities also to report how many workers are exposed to each Toxic Release Inventory chemical above background levels.

As far as release reporting, we recommend the following modifications to Form R reporting to improve release reporting.

Number one is to report all releases as releases. The law is clear that toxic chemicals injected underground, left in slack piles, or

dumped in landfills regardless of regulatory status are released into the environment. There is no magic place for industry to simply dump its waste where it has no effect on the environment. We require clear reporting on all of these areas.

Add additional boxes and codes to the Toxic Release Inventory reporting form, Form R at Sections 5.1 and 6.2 to better indicate the disposal methods used for toxic chemicals such as type of landfill and class of underground injection well, on- and off-site, and different forms of disposal such as slag tailings or combustion ash.

I recognize that there are documented cases of toxic pollution from slag piles, cold combustion waste, deep underground injection, blind landfills, and other disposal methods. Included in the definition of release, reporting on chemicals transferred off-site as products and finally improve understanding of toxic waste from public sewage plants.

EPA guidance can help these plants report releases by identifying typical pass through and destruction on rates for Toxic Release Inventory chemicals. I would also like to add that we encourage the EPA to follow-up on the Vice President=s statement at Earth Day to lower the thresholds for the extreme toxic chemicals that are released and that currently go unreported. Specifically, we are talking about mercury and dioxin.

Right now, the reporting thresholds are so high that those are not currently in Toxic Release Inventory data despite the fact that in very small amounts they are extremely toxic. So we do encourage them to follow-up and hopefully incorporate lower thresholds for these two deadly chemicals and the others that are also very contaminating to humans in the environment.

Also, we urge the EPA to adopt the model laws in New

Jersey and Massachusetts which have incorporated basically everything that I have spoken about today. As far as including use reporting, as far as lowering thresholds, as far as to increase reporting by industries. New Jersey and Massachusetts have the strongest Toxic Release Inventory laws in the nation. Both those states have made great strides in reducing their toxic release output.

As a matter of fact, combined both of them release, or Georgia releases about two-and-a-half times more toxic waste into the air, land, and water than Massachusetts and New Jersey combined and I think that is a testament to how well the laws work there.

Then my final statements have a couple of quotes from industries that have supported Toxic Release Inventory. Malwood Edwin [phonetic] from Dow Chemical has said that mandatory disclosure has done more than any legislation put together at getting companies to voluntarily reduce their emissions.

Randy Hinton [phonetic] from the Lyons [phonetic] Industry here in Marrieta said that the Toxic Release Inventory has helped Lyons [phonetic] save money because we did have to go out and calculate what we are losing and John Harrison from Dow Chemical said in the Houston Chronicle that Toxic Release Inventory opened up our industry to greater public view and that has been healthy, we believe, it will help accelerate the waste reduction mentality throughout the industry.

So there is support for Toxic Release Inventory from industry. What we have done so far has been wonderful and has gotten industry to reduce their amounts of toxins they put out. We do think there are things that can be improved to given the incentive to do even more and, also, more importantly give the public the right to know about toxins that are released in their neighborhoods. Thanks for the opportunity to speak today.

DR. AUGUSTYNIAK : Thank you. Is Adell Kushner here from Action for a Clean Environment? Rhonda Phillips from Environment Community Action. Do you have copies of your remarks?

RHONDA PHILLIPS : Good morning. My name is Rhonda Phillips and I am hear representing Environmental Community Action, more commonly known as Eco Action. We provide technical assistance to communities in Georgia confronting environment health threats. The Toxic Release Inventory is one of our most valuable resources that we utilizing in the following ways.

To educate the people within the community of potential exposure, plan around chemical accidents, to document sighting patterns, to negotiate good neighbor agreements within [unintelligible] Industries. Finally, we use Toxic Release Inventory as a tool to aid local physicians in assessing public health threats.

Toxic Release Inventory was developed for the public. It is the heart of the community right to know. If there are going to be any changes to the Toxic Release Inventory, it should be in the publics best interest. It should be expanded and enhanced for the public:s benefit. Do not allow the industry to turn back the clock.

Allow me to expound upon four points. Point number one, definition of the release. The EPA should not revise the definition of release. Leave it as it is. Any release including dumping, injection, or piling up the waste into the environment is a release.

Point two: thresholds. We are not receiving all of the information that we need on some of the most dangerous chemicals, such as lead, mercury, cadmium, and especially dioxin. We want you, EPA, to lower the thresholds level on persistent toxic chemicals.

Point number three: chemical use. We want the industry to

give an account for all chemicals used at their facility. Whether it is brought on-site, whether stored, how it is used, and how it is disposed of.

Let me give you an example of what I mean. The information is recorded on the current report showing that an industry using a ammonia and the maximum amount on-site is within a range. A range of 10,000, say a 100,000 pounds. The industry only accounts for 8,000 pounds of ammonia being released in the air. And 3,000 pounds are going to the sewage plant. A total releases of 11,000 pounds of ammonia.

I look at those figures and say is that it, is that all, or is that all the industry wants to inform the public. Remove the vague parameters and give detailed information.

Point number four: serving the people. EPA you should do whatever it takes to simplify and streamline your information. Develop a reporting system linking all environment laws together so that the average, every day citizen like I can look up information on a facility. The public should be given clear and detailed instructions on how to obtain this information from local libraries, the Internet, or EPA=s office and this should also include compliance history and enforcement.

EPA, we the public are concerned about with what goes in our communities. We are concerned about our health and anything that could possibly threaten the rise of our children. We want to know what is in our backyard.

Let me reiterate two points. Give more details not less. I understand that you want to do away with some of the paperwork, but valuable information cannot be lost in the process. Make public access easier. Once again we do want to know what is going on in our backyards. Thank you.

DR. AUGUSTYNIAK : Mark Woodall from the Sierra Club.

MARK WOODALL : Thank you. My name is Mark Woodall. I am the Vice Chair for the National Environmental Quality Strategy Team of the Sierra Club which coordinates the Sierra Club=s work on pollution prevention and dealing with toxic chemicals and where they form.

Of course, the Sierra Club is on level with emergency environmental groups in the country. We have 500,000 members. We got about 10,000 members in Georgia and we are involved with some of the Georgia legislation on these issues.

Our remarks have been developed in association with other groups like US PIRG so you are going to hear some of the things that you have heard already. In the area of release reporting, we also support reporting all releases as releases. We think that the laws are clear that any sort of chemicals being injected underground, or left in slag piles, or dumped in landfills, or released as Robert Pregulman spoke of awhile ago. There is no magic place that you can put this stuff and we are kind of surprised that the industry would suggest that dumping something underground, injecting it underground is not a release. That doesn=t sound like a very long term outlook at things.

We want to see additional boxes and codes added to the Toxic Release Inventory reporting form. We are going to indicate the disposal method used for toxic chemicals such as the type of landfill or class underground injection well. We would like to see better ways of interpreting to the public what actually happens when all those Toxic Release Inventory chemical releases or national we could still direct release until the public understands these items.

We are for recognizing documented toxic pollution from the slag piles, cold combustion waste, deep underground injection run off, landfills, and other disposal methods. Also, including in release any sort of

chemicals that might be included in progress and shipped off-site as releases also.

As mentioned before, we would like to see more explanation of POTWs so that people could understand the types of releases that go on in these sewage plants.

On source reduction reporting, we are also interested in requiring facilities to report total production waste, distinguish waste generated at the reporting facility from waste generated elsewhere and requiring facilities to report actual quantities of waste per minute through source reduction.

In the areas of thresholds, we are supportive of reporting thresholds to obtain meaningful reporting on the Biochemical to persistent toxic chemicals as you heard earlier. We are delighted that some of these coal burning power plants and other big builders in Georgia will soon be included. That has been quite an oversight so we are looking forward to that data coming online.

We don=t want reporting thresholds raised on Form A. In the area of integrated reporting, we support establishing a single facility identification number for each facility regulated under the Federal Environmental Laws and requiring universal registration of facilities that use toxic chemicals or regulated under the Federal Environment Law.

Under Chemical Use report, we are hopeful that that is where the Toxic Release Inventory is heading and we support requiring facilities to report a simple materials accounting of the chemicals that are used and requiring facilities to report how many workers are exposed to these Toxic Release Inventory chemical background.

While I am here, I want to echo some of the remarks from the EPA=s Lois Epstein. I guess she made this to the May 1 meeting where there was discussion about some types of biochemicals. This is a big concern of the Sierra Club=s persistent biochemical and toxic chemicals and

Lois Epstein has made the point that the EPA needs to make several administrative changes to Section 3.13 and Form R so that we can capture these biochemical toxins and show that the [unintelligible]. I want to point that out that we are simply very supportive of what the Toxic Release Inventory gives us. We would like to see it give more complete information so that people can know what is going on. Thanks.

DR. AUGUSTYNIAK : Thank you very much. Do you have copies of your remarks please?

MARK WOODALL : [unintelligible] I have got to [unintelligible] Washington people to [unintelligible]

DR. AUGUSTYNIAK : Yes, the docket will be open. Joel Carpenter from AMOCO?

JOEL CARPENTER : I would like to talk today about the first issue that I think Vicki Anderson mentioned in her preamble to this meeting.

Good morning, I am Joel Carpenter I am with Regulatory Services for AMOCO Corporation located here in Orlando. My area of responsibility is Federal Water Issues including underground injection control.

I have been with AMOCO Corporation for two years. I have ten years of industrial experience. I received my doctorate in chemistry in 1988 from the University of Texas. AMOCO Corporation appreciates the opportunity to provide comments to the EPA on Toxic Release Inventory reporting Form R. We commend the EPA for soliciting public input on ways to improve the types of direct information available to the communities. To help streamline regulatory reporting and ease the paperwork burden on the regulated community.

In my testimony this morning, I will first describe the AMOCO facility impact and then our concerns about Toxic Release Inventory, our recommendations, and finally the anticipated benefits.

First of all the facility, our Texas City refinery. AMOCO=s Texas City refinery is the largest in North America and the most complex refining facility in the world. Constructed in 1934 as the Pan-American refinery, Texas City system 1200 acres on Galveston Bay near the Gulf of Mexico. With a work force of 1900 employees, the refinery can typically process up to 460,000 barrels of oil, crude oil per day.

The refinery produces three basic grades of gasoline in addition to furnace oil, chemicals [unintelligible], jet fuel, raw materials for nearby chemical plants. The Texas City refinery utilizes permitted Class 1 hazardous waste in underground injection wells primarily for managing sour water generated for the processing of crude oil. For those of you not familiar with sour water that is when you process crude oil it is full of sulfa

compounds. You don=t want the sulfa turning into acid rain and so during the refining process you pull out the sulfa compounds and so that=s what you are trying to dispose of at this facility.

The Toxic Release Inventory provides government regulators and the general public with tremendous amount of data about chemical releases, transfers, and waste management activities.

Since it=s creation in 1987, the Toxic Release Inventory has helped facilitate community right to know and to gauge progress of Facilities towards release and waste production goals. Annual releases of the Toxic Release Inventory data is an event that is anticipated by the regulated community and how the [unintelligible] presents data is extremely important.

To date, the EPA has placed much greater emphasis on mandating submission of data. We appreciate the focus the EPA is now placing on developing policies and mechanism for the responsible stewardship of the data it receives and information it publishes. If EPA hopes to rely increasingly on right to know and other informational programs to achieve improved environmental performance, it will have to effect change through information stewardship and increasingly effective presentation of the data. Otherwise the Agency will continue to disseminate information that is of compromised usefulness and that misrepresents risk.

AMOCO supports open communication with the public on a regular basis. At Texas City, we are involved in Texas City [unintelligible] Community Advisory Panel. We continually strive to improve the information that we provide the public to ensure that it is both accurate and presented in a relative context.

In support of these goals, I am here this morning to provide AMOCO=s comments and suggestions for collection and disseminating environmental data that lessens the public misperception reporting regarding Class 1 deep well injection.

At present, both Toxic Release Inventory and the Form R classify waste injected into class one wells in a way that creates the misimpression that the waste management activity poses on uncontrolled environmental risk. Grouping Class 1 injection with direct discharges through air and surface waters create the misimpression that Class I wells also discharges waste directly into the human environment.

As a result, many press reports inaccurately describe Class 1 injection in terms like spewing, dumping, discharges through waterways, even public health crises. We have all seen the newspaper headings and graphics that falsely portray deep well numbers coming out of smoke stacks. The truth, as confirmed by several EPA analyses and reports, is that Class 1 industrial deep well injection is a safe and effective waste management method that does not cause release of toxic chemicals to the community environment where human environmental exposure is at risk. Accordingly, the Toxic Release Inventory reporting scheme should modified to reflect this reality.

The EPA recognizes that reporting Class 1 deep well injection as Arelease to the environment@ under the Toxic Release Inventory may create potential for Toxic Release Inventory data on Class 1 injection to be mischaracterized and/or misunderstood. This is why we are hear today. Yet, the EPA has not been willing to relabel Class 1 injection in it=s Toxic Release Inventory reporting program to eliminate the potential for public misunderstanding.

Instead, the Agency has indicated that it does not have the statutory authority based on it=s interpretation of Arelease@ to environment under EPCRA to address this problem. [Unintelligible] supply Arelease@ to

specify the activity that facilities must report to the EPA. Although EPCRA does require Class 1 deep well injection to be report on the Form R. It does not compel EPA to call Class 1 deep wells injection a quote release to the environment.

Public forum or in its public release of Toxic Release Inventory data. Section 3.13 requires reporting of Athe gain of quantity of the toxic chemical entering to each environment [unintelligible]@.

It does not require Class 1 injection to be called a quote release on the Form R. EPCRA requirements would be satisfied just as well by reporting Class 1 injection as quote uncontained disposal or controlled waste management.

AMOCO Corporation does not believe in the EPA=s interpretation of the term release and environment under EPCRA=s directive for reporting of Class 1 injection. Even under the EPA=s interpretation we believe that the Agency has the ability to meet the challenges recently defined by EPA Administrator Carol Brown [phonetic] of carrying out the task of delivering more, better, and increasingly useful information to the American people.

The EPA=s interpretation still allows the Agency to make the necessary changes to one [unintelligible] public misconceptions. These are our recommendations. The EPA has asked for specific recommendations from the public. There are several ways the EPA can address confusion and the misperception regarding the Toxic Release Inventory. These options can be readily implemented by the Agency under current statute. Our first suggestion.

The EPA should not use the term release or the phrase release to the environment when collecting or presenting deep well injection Toxic Release Inventory data. Deep well injection should not be referred to as release to the environment. Note that F code Section 3.13G1C4 requires the recording on the Form R of the annual quantity of

toxic chemicals entering into each environmental [unintelligible]. It does not require that Class 1 injection be called a release. This statutory proof provision would be satisfied just as well by reporting Class 1 injection as a contained or a confined emission.

Number two: the EPA should develop, should help the public help understand the relative risk associated with Toxic Release Inventory data especially as it relates to deep well injection by not summing these data with releases to air and water. Class 1 deep ground injection information to be kept separate so that these data can be adequately differentiated and explained to the public.

Number three: The EPA should consider options for new categories for reporting deep well injection. These options could include the descriptor such as contained or confined. Simply splitting up the various form of underground injection is not enough.

Finally, the EPA should continue to explain deep well injection does not result in the exposure of the public to Toxic Release Inventory chemicals. Deep well injection by virtue of its design and regulation does not result in exposure injected chemicals to assessable environment.

Our Texas City refinery manages sour water by injecting it over a mile underground. The injection generally consists of geologically stable isolated by thousands of feet of rock that will not allow upwardly movement of any of the injected material to the near surface or shallow water formations.

The EPA and the State of Texas has strict regulations for deep well injection operation permitting. A key requirement is demonstration by mathematical modeling that no migration of sour water will occur out of the injection down for at least 10,000 years.

AMOCO has undertaken extensive studies which indicate that alternatives to deep well injection of sour water would result in the

emissions of greater environmental impacting risk of human exposure. Here is our perceived [unintelligible] according to this [unintelligible].

AMOCO Corporation believes that the public is best served by Toxic Release Inventory when it can use the data to make informed judgments by improving the accuracy of Toxic Release Inventory portrayal of deep well technology. The EPA would give the public an important new tool for enhancing environmental understanding. By incorporating the four steps outlined above, the following benefits will be realized.

Number one: improved right to know information provided to our communities to improve public understanding of the Toxic Release Inventory and Class 1 injection.

Number two: eliminate the misperception that the use of Class 1 injection wells necessarily results in actual exposure of people or the environment to a toxic chemical.

Number three: expanding information of Class 1 injection provided community without increasing the reported [unintelligible] on the Toxic Release Inventory reports.

Number four: preserve the ability to track the use of Class 1 injection and change in the use of Class 1 injection by Toxic Release Inventory reportings for pollution prevention purposes.

And finally number five: reduce the Toxic Release Inventory [unintelligible] of Class 1 injection well operating of reducing the kind of resources in providing clarification and explanation of the Toxic Release Inventory data.

On behalf of the AMOCO Corporation I appreciate this opportunity to talk with you.

DR. AUGUSTYNIAK : Thank you. Is Robert Fuller from the Environment Justice Resource Center here? Okay, and we have not or have we been joined by Adell Kushner? That is our list of speakers for this morning. If people have additional comments or want to engage in some discussion, I will ask that when you go to the microphone that you state your name and affiliation clearly so that we can have a clear record of the discussion of the meeting. Is there someone who would like to make additional comments or someone who wasn=t signed up that would like to offer comments? Is there someone who would like to make additional comments? Okay. Small talk.

Thank you for the participation. We will be staying here in case people arrive later. We will be here until noon, so that those of you who want to stay are welcome to stay with us. All right. Thank you.